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## BEFORE THE POSTAL RATE COMMISION WASHINGTON, D.C. 20268-0001

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Complaint on First-Class Mail	:	
Service Standards	:	Docket No. C2001-3
	:	

SECOND MOTION OF THE UNITED STATES POSTAL SERVICE REQUESTING EXTENSION OF DEADLINE FOR FILING OF MOTION FOR CERTIFICATION (August 16, 2002)

For the reasons stated below, the Postal Service respectfully moves that it be granted a second extension of the deadline for filing a motion for certification of Presiding Officer's Ruling No. C2001-3/28.

On August 6, 2002, the Presiding Officer granted the Postal Service's August 5, 2002, request for an extension of this deadline until today. At that time, the Postal Service anticipated that all internal deliberations concerning its response to the ruling would have been completed this week. In hindsight, it appears that the Postal Service was optimistic in its initial projection.

Late yesterday, it became apparent that those consultations would not be completed by today and that, because of previous commitments by key participants, could not resume until Tuesday of next week. It is, however, expected that the deliberations can be completed by the end of next week.

Accordingly, therefore, the Postal Service requests that it be granted a second

extension of the deadline for filing of any motion for certification in response to Ruling No. C2001-3/28.-- until August 23, 2002.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel Ratemaking

Michael Jidwell

Attorney

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document on all parties of record in this proceeding.

Michael J. Zidwell

Michael T. Tidwell

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